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13 Attorneys for Defendant  
14 SALVADOR GUDINO CHAVEZ (11)

15  
16 UNITED STATES DISTRICT COURT  
17  
18 EASTERN DISTRICT OF WASHINGTON

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20 UNITED STATES OF AMERICA, } CASE NO.: 4:15-CR-6049-EFS-11  
21 Plaintiff, } MOTION FOR EXTENSION OF TIME  
22 v. } TO FILE SENTENCING DOCUMENTS  
23 SALVADOR GUDINO CHAVEZ, }  
24 Defendant. }

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27  
28 Defendant, SALVADOR GUDINO CHAVEZ (11) (hereinafter referred to as  
“Defendant”), by and through counsel, Lupe C. Rodriguez, Jr. of the Law Office of Lupe  
Rodriguez, Jr. APC and local counsel Timothy Scott, of Scott Trial Lawyers, submits the  
following Motion for Extension of Time to File Sentencing Documents.

Defendant entered a plea of guilty on May 8, 2018. The Sentencing is currently set  
for March 11, 2019. The Court’s Order requires a review of the Presentence Investigation  
Report (PSR) and all sentencing motions and memorandums to be filed within 14 days of  
the disclosure of the draft PSIR. (ECF 1022). The PSIR was filed on November 19, 2019.

1 Defense counsel suffered a family emergency which required the continuance of  
2 the sentencing hearing in this case and which has taken much of Defense counsel's time  
3 since October 2018 to the present. As such, Defendant is respectfully requesting an  
4 extension of time until February 25, 2019, in order to file the above referenced sentencing  
5 related documents. Defense counsel has discussed this schedule with counsel for the  
6 Government in this cause. Counsel for the Government has no objection to this request.

7 Law Office of Lupe Rodriguez, Jr. APC

8 Dated: February 21, 2019

s/Lupe Rodriguez, Jr. \_\_\_\_\_  
9 Lupe C. Rodriguez, Jr.  
10 Attorney for Defendant  
11 Salvador Gudino Chavez (11)

12 Dated: February 21, 2019

s/Timothy Scott \_\_\_\_\_  
13 Timothy Scott  
14 Associated Local Counsel and  
15 Attorney for Defendant  
16 Salvador Gudino Chavez (11)

17 CERTIFICATION

18 I hereby certify that on February 21, 2019, I electronically filed the foregoing with  
19 the Clerk of the Court using the CM/ECF System which will send notification of such  
20 filing to the following:

21 AUSA Stephanie Van Marter, [stephanie.vanmarter@usdoj.gov](mailto:stephanie.vanmarter@usdoj.gov)

22 s/Lupe Rodriguez, Jr. \_\_\_\_\_  
23 Lupe C. Rodriguez, Jr.  
24 Attorney for Defendant  
25 Salvador Gudino Chavez (11)